

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	No. 6:20-CR-64
	§	Judge JCB/KNM
STEPHANIE MICHELLE STEWART	§	

**ELEMENTS OF OFFENSE**

The defendant has been charged in Count 1 of the indictment with theft of mail in violation of 18 U.S.C. § 1708. The essential elements which must be proven beyond a reasonable doubt to establish a violation of this offense are:

- FIRST: That multiple pieces of mail were in a mail receptacle, as described in the indictment; and
- SECOND: That the defendant stole the pieces of mail from the mail receptacle, as described in the indictment.

Mail matter is stolen when it has been wrongfully taken from an authorized depository for mail matter with intent to deprive the owner, temporarily or permanently, of its use and benefit. That intent must exist at the time the mail matter is taken from the mails.

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Respectfully submitted,

NICHOLAS J. GANJEI  
ACTING UNITED STATES ATTORNEY

/s/ Allen H. Hurst  
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Elements of the Offense was served on counsel of record for defendant via the court's CM/ECF on this the 24th day of February 2021.

/s/ Allen H. Hurst  
Allen H. Hurst

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